

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Deshawnda L. Williams Debtor	CHAPTER 13
PENNSYLVANIA HOUSING FINANCE AGENCY Movant	BKY NO.: 20-10630-AMC
vs.	
Deshawnda L Williams Debtor	
Scott F. Waterman Trustee	

RESPONSE TO MOTION FOR RELIEF
FILED BY PENNSYLVANIA HOUSING FINANCE AGENCY

Debtor, by their attorney, Brandon J. Perloff, Esq., of Brandon Perloff, P.C., by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. Movant's averment refers to documents on record before the Court.

The Debtor does attest to the authenticity or veracity of said documents. Said documents speak for themselves.

4. Admitted.
5. Admitted.
6. Denied. By way of further response, Debtor will cure any arrears due at this time.
7. Denied. Debtor is without the requisite knowledge to attest to the veracity of

Movant's averment.

8. Denied. By way of further response, Debtor will cure any arrears due at this time.
9. Denied. Movant's averment is a conclusion of law to which no response is

required.

10. Denied. Movant's averment is a conclusion of law to which no response is required.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Dated: July 2, 2024

/s/ Brandon Perloff

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